

**Subject: Program Integrity**

**Item: WIC Services for Employees and Relatives**

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**PURPOSE:**

To ensure that no conflict of interest exists and to prevent staff fraud and abuse.

**POLICY:**

Local Agency (LA) employees are prohibited from participating in any component of the certification process and issuing food instruments (FI) to themselves, their relatives or close friends.

**PROCEDURE(S):**

- I. Only the LA director, site supervisor or designee (an individual selected by the LA director or site supervisor to act on their behalf) is authorized to:
  - A. Determine WIC eligibility for LA employees, their relatives, and close friends.
  - B. Process the certification, provide appropriate nutrition education contacts, prescribe and issue FIs.
- II. The LA director, site supervisor, or designee must:
  - A. Restrict access to the applicant/participant WIC Management Information System (WIC MIS) record by designating it "confidential".
  - B. Secure and file the applicant/participant paper records separately from the general paper files.
  - C. Maintain separation of duties. If separation of duties is not achieved, a different staff person (an individual that has the authority to change an eligibility determination and not directly related to the certification) must conduct:
    1. A post review of all such certification records within 2 weeks of certification.
    2. Documentation of the review(s) must be maintained on file at the LA for review during program monitoring visits.

**AUTHORITY:**

[7 CFR §246.4\(a\)\(27\)](#)

**CROSS REFERENCE:**

WPPM 210-16 Separation of Duties

WPPM 970-10 Glossary